

Caridis, Alyssa

From: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Sent: Wednesday, January 13, 2021 9:41 PM
To: Jordan Jaffe; Roberts, Clement; Caridis, Alyssa; QE-Sonos3
Cc: Sonos-WDTX0881-service; Paige Amstutz
Subject: RE: Sonos v Google (WDTX) -- Amended Complaint

Alyssa,

It is Google's position that all proceedings in this case – including the parties' upcoming invalidity and claim construction deadlines – should be stayed until a final resolution of Google's motion to transfer. On Monday, Sonos indicated that it opposes such a stay. In the alternative, would Sonos be willing to complete venue discovery on an accelerated timeline to permit resolution of Google's transfer motion prior to Markman and other substantive portions of the case? We propose the following schedule:

- Venue discovery closes March 8
- Sonos responsive brief March 22
- Google reply brief April 5
- Hearing April 12 or as soon as the court can accommodate

To the extent the case is not stayed pending transfer, the case schedule will need to be adjusted in light of Sonos's request to add the '885 patent. When we discussed this on Monday, you indicated that Sonos may be amenable to some sort of adjustment. We would suggest pushing all substantive deadlines (i.e., those not associated with Google's motion to transfer and/or venue discovery) by eight weeks. This would include all claim construction deadlines as well as the Markman hearing. Google requires an eight-week extension to, among other things, conduct a further prior art search, investigate collecting additional documents for its initial technical production, and consider the implications of the new patent on claim construction.

During our call on Monday, you suggested keeping the existing schedule for the currently-asserted patents and creating a new schedule for the '885 patent. Frankly, we do not see how such a dual-track schedule would work. Given that the '885 patent is related to the '206 and '966 patents, the parties and the Court will be best-served if the parties negotiate claim terms and submit claim construction briefing on all three patents together. We are available if it would be helpful to discuss.

On Monday we also discussed adding the '885 patent to the NDCA DJ case. Sonos indicated that it would likely not oppose such a request. Please let us know Sonos's final position on this issue as soon as possible.

Lindsay

From: Jordan Jaffe
Sent: Sunday, January 10, 2021 9:50 PM
To: Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>

Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>; Paige Amstutz <pamstutz@scottdoug.com>

Subject: RE: Sonos v Google (WDTX) -- Amended Complaint

Clement,

1pm Pacific works on our end. I'll circulate a zoom invite shortly.

Alyssa's email requested a meet and confer, so my email was in response to that. In any event, we'd like to discuss the basis for Sonos's request to assert the '885 patent and its possible effect on this case.

Best regards,

Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // jordanjaffe@quinnemanuel.com

From: Roberts, Clement <croberts@orrick.com>

Sent: Friday, January 08, 2021 5:31 PM

To: Jordan Jaffe <jordanjaffe@quinnemanuel.com>; Caridis, Alyssa <acaridis@orrick.com>; QE-Sonos3 <ge-sonos3@quinnemanuel.com>

Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>

Subject: RE: Sonos v Google (WDTX) -- Amended Complaint

[EXTERNAL EMAIL]

Jordan –

I can meet and confer on Monday afternoon. How about 1pm pacific?

Would you kindly tell me what it is you would like to discuss so I can consider your position in advance of the meeting? Its not required, of course, but it may make the meeting more productive.

Thanks,

Clem

From: Jordan Jaffe <jordanjaffe@quinnemanuel.com>

Sent: Friday, January 8, 2021 5:04 PM

To: Caridis, Alyssa <acaridis@orrick.com>; QE-Sonos3 <ge-sonos3@quinnemanuel.com>

Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>

Subject: RE: Sonos v Google (WDTX) -- Amended Complaint

Alyssa,

Are you able to meet and confer regarding this request on Monday afternoon (PT)?

Best regards,

Jordan R. Jaffe

Partner,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Caridis, Alyssa <acaridis@orrick.com>

Sent: Friday, January 08, 2021 3:01 PM

To: QE-Sonos3 <qe-sonos3@quinnemanuel.com>

Cc: Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>

Subject: Sonos v Google (WDTX) -- Amended Complaint

[EXTERNAL EMAIL]

Counsel,

Sonos intends to move next week to amend the operative complaint in this action to add a new asserted patent (USPN 10, 848,885). Sonos's proposed amended complaint is attached, as well as a red-line document showing changes from the original complaint. In addition, Sonos attaches hereto its anticipated Supplemental Infringement Contentions and claim chart relating to the '885 Patent.

Please let us know when you are available early next week for a meet and confer pursuant Local Rule 7(i).

Thanks,

Alyssa

Alyssa Caridis

Intellectual Property

Partner

Pronouns: she/her/hers

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